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 THE STANDARD FIRE INSURANCE COMPANY  
 (ERRONEOUSLY SUED HEREIN AS THE  
 STANDARD FIRE INSURANCE COMPANY D/B/A TRAVELERS)

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AMANDA EVANS, individually	)	CASE NO.: 2:20-cv-01802-KJD-DJA
	)	
Plaintiff,	)	<b>STIPULATION TO EXTEND TIME</b>
	)	<b>SET FORTH IN THE PARTIES' JOINT</b>
vs.	)	<b>DISCOVERY PLAN AND SCHEDULING</b>
	)	<b>ORDER SUBMITTED IN COMPLIANCE</b>
THE STANDARD FIRE INSURANCE	)	<b>WITH LR 26-1(b)</b>
COMPANY d/b/a TRAVELERS; and DOES I	)	
through X; and ROE CORPORATIONS I	)	
through X, inclusive,	)	[First Request]
	)	
Defendants.	)	
	)	

Defendant THE STANDARD FIRE INSURANCE COMPANY d/b/a TRAVELERS and  
 Plaintiff AMANDA EVANS, through their respective counsel, stipulate to extend the times set forth  
 in the Parties' Joint Discovery Plan and Scheduling Order Submitted in Compliance with LR 26-1(b)  
 (ECF 18) for a period of 45 days on the grounds the parties have agreed to mediate this matter on  
 March 15, 2021 before Judge Jackie Glass.

1 The parties respectfully submit that good cause exists for this stipulation based on the  
2 following:

3 1. Plaintiff filed its Complaint for Declaratory Relief in this matter on June 25, 2020  
4 (ECF 1).

5 2. Defendant filed its Answer in this matter on September 28, 2020 (ECF 4).

6 3. On November 24, 2020 a Joint Discovery Plan and Scheduling Order Submitted in  
7 Compliance with LR 26-1(b) was submitted by the parties and entered by the Magistrate Judge (ECF  
8 18).

9  
10 **THE CURRENT DISCOVERY PLAN AND SCHEDULING ORDER SET THE**  
11 **FOLLOWING DEADLINES:**

12 1. The disclosure of experts, pursuant to Fed.R.Civ.P.26 (a)(2) were to be made on or  
13 before February 18, 2021 - 60 days before the proposed discovery cut-off date. Disclosure of rebuttal  
14 experts were to be made by March 22, 2021 - 31 days after the initial disclosure of experts.

15 2. The discovery cut-off date was to one-hundred and eighty (180) days from the date  
16 of the FRCP Rule 26 discovery conference which equated to a discovery cut-off date of April 19,  
17 2021 - 180 days.

18 3. The date for filing dispositive motions was to be no later than May 20, 2021 - 30 days after  
19 the proposed discovery cut-off date.

20 4. The date for filing the joint pretrial order was to be not be later than June 20, 2021 - 32 days  
21 after the cut-off date for filing dispositive motions.

22 5. The disclosures required by Fed.R.Civ.P.26 (a)(3), and any objections thereto, shall be  
23 included in the joint pretrial order.

24  
25 **DISCOVERY COMLETED:** The parties have completed the following discovery:

26 a) Initial disclosures have been exchanged.  
27  
28

b) Defendants have served Subpoena Duces Tecums upon the Custodian of Records of Aline Your Spine, ATI Physical Therapy, Innovative Pain Care Center, Pueblo Medical Imaging, Summerlin Hospital Medical Center, and Too Faced Cosmetics.

c) Interrogatories and requests for production have been served upon Plaintiff by Defendant.

d) Plaintiff has served interrogatories and requests to produce upon Defendant.

**DISCOVERY THAT REMAINS TO BE COMPLETED:**

The parties anticipate that the following depositions will be taken:

- a) The deposition of Plaintiff;
- b) The depositions of Plaintiff's treating physicians;
- c) The deposition of Plaintiff's employer;
- d) The deposition of the parties' experts; and
- e) Plaintiffs will depose Travelers' adjuster and 30 (b) (6) designees.

Also, the parties anticipate the inspection of the vehicle as well as other discovery that arises as a result of the above referenced discovery.

**THE REASON WHY THE DEADLINES WILL NOT BE SATISFIED BY THE TIME LIMITS SET BY THE PARTIES CURRENT DISCOVERY PLAN:** The parties have agreed to mediate on March 15, 2021 before Judge Jackie Glass. The parties wish to avoid the expense of having their experts prepare this case before attempting to resolve the matter at mediation.

**THE PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

1. The disclosure of experts, pursuant to Fed.R.Civ.P.26 (a)(2) will be made on or before April 2, 2021 - 60 days before the proposed discovery cut-off date. Disclosure of rebuttal experts will be made by May 6, 2021 - 31 days after the initial disclosure of experts.

2. The discovery cut-off date will be June 3, 2021.

Page 4 of 4